

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA,  
SOUTHERN DIVISION**

**DARRYL ANDERSON, et. al.,**

**Plaintiffs,**

**v.**

**PERDUE FARMS. INC.,**

**Defendant.**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO.  
1:06-cv-01000-MEF-WC**

**NOTICE OF FILING ADDITIONAL  
NOTICES OF CONSENT TO JOIN**

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by, TYRONZA SMITH, PETRONIA D. LOVE, JONAS SOL, MICHAEL HALE, and VERONICA HOWIE, similarly situated employees to Plaintiffs who likewise are or were subjected to the illegal pay practices at issue and who wish to join the above-captioned lawsuit.

Dated: March 21, 2007

Respectfully submitted,

**THE COCHRAN FIRM, P.C.**

/s/ Robert J. Camp

**ROBERT J. CAMP**

**BERNARD D. NOMBERG**

505 North 20<sup>th</sup> Street, Suite 825

Birmingham, AL 35203  
(205) 930-6900 (Phone)  
(205) 930-6910 (Fax)

– and –

Samuel A. Cherry, Jr.  
Lance H. Swanner  
**THE COCHRAN FIRM, P.C.**  
163 West Main Street  
P. O. Box 927  
Dothan, AL 36302  
(334) 793-1555 (Phone)  
(334) 793-8280 (Fax)

– and –

Richard B Celler  
**MORGAN & MORGAN, P.A.**  
284 South University Drive  
Fort Lauderdale, FL 33324  
(954) 318-0268 (Phone)  
(954) 333-3515 (Fax)

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 21, 2007, I electronically filed the foregoing Notice of Filing Additional Notices of Consent to Join with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to:

Sandra B. Reiss  
sandra.reiss@odnss.com

Lance Harrison Swanner  
lswanner@cochranfirm.com

James J. Kelley  
jkelly@morganlewis.com

Bernard D. Nomberg  
bnomberg@cochranfirm.com

Brian Z. Liss  
bliss@morganlewis.com

Samuel A. Cherry, Jr.  
scherry@cochranfirm.com

/s/ Robert J. Camp  
**ROBERT J. CAMP**

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Tyronza Smith states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms Inc. at  
[Name of plant]  
the facility located in Dothan, AL. I worked at this location from  
[City/State]  
1-11-83 to 2-21-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms Inc. plant in Dothan, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Farms Inc.. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 5 day of March, 2007.

Tyronza Smith  
[PRINT NAME]

Tyronza Smith  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Petronia D. Love states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at  
[Name of plant]  
the facility located in Dothan Alabama. I worked at this location from  
~~7-12-94~~ 9-7-99 to present  
[City/State] [Date, or if still working write "present"]  
[Date]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan Alabama, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 5<sup>th</sup> day of March, 2007.

Petronia D. Love  
[PRINT NAME]

Petronia D. Love  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Michael Hale states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Chicken at  
[Name of Plant]  
the facility located in Dothan Alabama I worked at this location from  
[City/State]  
Dec-28-05 to Feb-26-06.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Chicken plant in Dothan Alabama, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Chicken. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 14 day of February, 2007.

Michael Hale  
[PRINT NAME]

Michael Hale  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Jonas Sol states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue at  
[Name of plant]  
the facility located in Dothan, AL. I worked at this location from  
[City/State]  
6/24/05 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue plant in Dothan, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 6<sup>th</sup> day of October, 2006.

JONAS SOL  
[PRINT NAME]

Jonas Sol  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Veronica Howie states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms, Inc., at  
[Name of Plant]  
the facility located in Dothan, AL.. I worked at this location from  
[City/State]  
10-11-04 to Present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms, Inc. plant in Dothan, AL., and  
[Name of Plant] [City/State]  
possibly other plants owned by Perdue Farms, Inc.. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 27<sup>th</sup> day of February, 2007.

Veronica Howie  
[PRINT NAME]

Veronica Howie  
[SIGN NAME]